

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. MACILL
CLERK OF COURT

2023 JUL 11 PM 12:02

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MOHAMED FARAH WAES,

Defendant.

CASE NO. _____

JUDGE

INDICTMENT

18 U.S.C. § 248(a)(1)

18 U.S.C. § 875(c)

18 U.S.C. § 844(e)

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST DIV. COLUMBUS

2:23-CR-147
Judge Watson

THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

1. The defendant, **MOHAMED FARAH WAES** (“WAES”), resided in or near Columbus, Ohio, within the Southern District of Ohio.
2. Planned Parenthood of Greater Ohio (PPGOH) operates medical facilities throughout Ohio, including in Columbus, Ohio, that provide reproductive healthcare services, including abortion services. PPGOH maintains a website which clearly identifies the services it provides.
3. L.L. is a call center agent employed by the Clinical Health Network for Transformation (CHN) to answer incoming telephone calls to PPGOH.

COUNT ONE

1. The factual allegations contained in Paragraphs 1 through 3 of the Indictment are re-alleged and fully incorporated by reference herein.

2. On or about July 5, 2022, in the Southern District of Ohio, the defendant, **MOHAMED FARAH WAES**, by threat of force, intentionally intimidated and interfered with, and attempted to intimidate and interfere with, L.L. and the employees of PPGOH, because PPGOH was and had been providing reproductive health services, and in order to intimidate L.L. and the employees of PPGOH from providing reproductive health services.

All in violation of Title 18, United States Code, Section 248(a)(1).

COUNT TWO

3. The factual allegations contained in Paragraphs 1 through 3 of the Indictment are re-alleged and fully incorporated by reference herein.

4. On or about July 5, 2022, in the Southern District of Ohio, and elsewhere, the defendant, **MOHAMED FARAH WAES**, knowingly and willfully transmitted in interstate and foreign commerce, a communication, which contained a threat to injure another person, to wit: **WAES** contacted PPGOH by telephone, spoke with L.L., and indicated that he would burn down a PPGOH facility and everyone in it, or words to that effect.

All in violation of Title 18, United States Code, Section 875(c).

COUNT THREE

5. The factual allegations contained in Paragraphs 1 through 3 of the Indictment are re-alleged and fully incorporated by reference herein.

6. On or about July 5, 2022, in the Southern District of Ohio, and elsewhere, the defendant, **MOHAMED FARAH WAES**, through the use of an instrument of interstate or foreign commerce, to wit: a telephone, willfully made a threat to kill, injure, and intimidate any individual and to unlawfully damage and destroy a building by means of fire and an explosive.

All in violation of Title 18, United States Code, Section 844(e).

A TRUE BILL.

s/Foreperson

GRAND JURY FOREPERSON

KENNETH L. PARKER
UNITED STATES ATTORNEY

A handwritten signature in blue ink, appearing to read "Jennifer M. Rausch", written over a horizontal line.

JENNIFER RAUSCH (OH 0075138)

Assistant United States Attorney

KRISTEN CLARKE
ASSISTANT ATTORNEY GENERAL
CIVIL RIGHTS DIVISION

A handwritten signature in blue ink, appearing to read "Daniel Grunert", written over a horizontal line.

DANIEL GRUNERT (DC 1721133)

Trial Attorney